

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**ALLIANCE FOR HIPPOCRATIC
MEDICINE**, on behalf of itself, its member
organizations, their members, and these
members' patients, et al.,

Plaintiffs,

v.

**U.S. FOOD AND DRUG
ADMINISTRATION**, et al.,

Defendants.

Case No. 2:22-cv-00223-Z

**UNOPPOSED MOTION FOR LEAVE TO FILE
BRIEF OF *AMICI CURIAE*
TEXAS BUSINESS LEADERS
IN SUPPORT OF PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 7 and this Court’s local civil rule 7.1 and 7.2(b), movants Texas Business Leaders respectfully seek this Court’s leave to file the accompanying brief as *Amici Curiae* in support of Plaintiffs’ motion for preliminary injunction (ECF No. 6). Counsel has been informed that Plaintiffs and Defendants have mutually consented to the filing of *amicus* briefs on or before February 10, 2023. As such, counsel represents that this Motion is unopposed and a proposed Order will also be submitted with this Motion.¹

IDENTITY AND INTEREST OF MOVANTS

Amici are a group of business leaders from across America, and Texas in particular, that work to combine traditional principles with ingenuity in the marketplace in order to help their companies succeed both financially and morally. Together they represent thousands of Christian employers who provide jobs to almost a million workers. They are also committed to safeguarding the vital role women play in the economic life of our State and will continue working to ensure that women understand their importance in the economy in general. Indeed, as one *Amicus* in particular shows, it is possible to be both a mother and the President/CEO of a successful company. Instead of treating children as a commodity to be traded for profit or accomplishment, *Amici* believe (and demonstrate) that companies can

¹ Consistent with Federal Rule of Appellate Procedure 29(a)(4)(E), counsel for *Amici Curiae* authored this brief in whole. No counsel for a party authored this brief in any respect and no person or entity—other than *Amici*, their members, or their counsel—contributed monetarily to this brief’s preparation or submission.

provide ways for women to be successful in both their professional and personal lives without unfettered access to abortifacients.

REASON TO GRANT MOVANTS' REQUEST TO FILE *AMICUS* BRIEF

Movants Texas Business Leaders respectfully submit that the brief of *Amici Curiae* submitted here will assist the Court with addressing background arguments concerning the supposed need for the FDA regulations at issue to be set aside for economic reasons. Movants therefore request that this Court grant leave for *Amici* to file the attached brief.

CONCLUSION

The Unopposed Motion for Leave to File Brief of *Amici Curiae* should be granted.

Dated: February 10, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, a true and correct copy of this Unopposed Motion for Leave to File Brief of *Amici Curiae* was served by CM/ECF on all counsel or parties of record.

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